

III. REMARKS

1. Claims 1, 6 and 11 are amended. Claims 1-16 are currently pending.

These amendments do not require additional consideration or search because these amendments naturally follow from the language in Applicant's claims in that the lips are "located at and extending outward from edges of said keymat". Further, the amendments also stem from Applicant's prior arguments pertaining to the location of the pins in Jokinen being located on an interior portion of the keymat.

2. Claims 1-16 are patentable under 35 U.S.C. 103(a) over Jokinen et al., U.S. Pub. No. 2003/0201983 ("Jokinen") in view of Mockridge et al., U.S. Patent 6,876,543 ("Mockridge"). Applicant reasserts the arguments presented in it's prior response, in that neither Jokinen nor Mockridge, individually or in combination disclose or suggest that the keymat comprises a plurality of lips located at and extending outward from edges of the keymat toward a rim of the cover, and the cover comprises a plurality of indentations configured to receive the plurality of lips and that the indentations are located at edges of a recess for removably mounting the keymat. The arguments from the prior response are incorporated herein by reference in their entirety.

As argued by Applicant in the prior response, the key pins and the circumferential lip of Jokinen are located on an interior portion of the keymat as clearly shown in Figures 3a and 5c (See annotated diagram of Figures 3a and 3b of Jokinen attached hereto as "Exhibit A". Figure 5c of Jokinen is substantially the same as Figure 3a). The edges of the keymat in Jokinen do not have any lips that hold the edges of the keymat to the cover (320).

Rather, the edges of the keymat in Jokinen freely sit against the surface of the cover (320) (Figs. 3b, 4e and 5d). Therefore, the edges of the keymat in Jokinen cannot have lips that are received by indentations in the cover (320). Furthermore, there is no rim on the cover for the lip on the keymat of Jokinen to extend toward as the surface of the cover is smooth and flat (Figs. 3b, 4c and 4e).

In addition, Applicant reasserts that Mockridge does not disclose or suggest that the keymat is removable or that the keymat comprises a plurality of lips located at and extending outward from edges of the keymat toward a rim of the cover (See annotated diagram of Figure 1 of Mockridge attached hereto as "Exhibit B"). In Mockridge, the only mention of a keypad is in the context of positioning the keypad during assembly of the telephone (10) (Col. 3, L. 29-38). There is simply no disclosure of the keypad of Mockridge having a plurality of lips located at and extending outward from edges of the keymat toward a rim of the cover.

Applicant also reasserts that Mockridge does not disclose or suggest the cover comprises a plurality of indentations configured to receive the plurality of lips (from the keymat). Nor does Mockridge disclose or suggest that the indentations are located at edges of a recess for removably mounting the keymat. As described above, the keypad of Mockridge is not removable and the keypad of Mockridge is located on the endoskeleton (16). The endoskeleton (16) is enclosed between the front and rear housing (12, 14). There is no disclosure or suggestion of either the front or rear housing (12, 14) of Mockridge having a plurality of indentations configured to receive the plurality of lips located at edges of a recess for removably mounting the keymat.

Adding to these prior arguments that the combination of Jokinen and Mockridge does not disclose or suggest a plurality of lips located at and extending outward from edges of the keymat toward a rim of the cover, and that the cover comprises a plurality of indentations configured to receive the plurality of lips as called for in claim 1, Applicant submits the following. The key pins (315) in Jokinen are inserted into openings (341, 241) located in the front cover of the phone where a circumferential lip (314) on the key pin (315) engages the interior surface (321) of front cover (320) proximate to opening (341, 241) (paragraph [0035]; Fig. 3c). As can be seen in Fig. 3c, and by definition opening (341, 241) is a "hole or void in solid matter" (Random House Webster's College Dictionary, Page 948, Def. No. 3, Copyright 1992, attached hereto as "Exhibit C"). An indentation, on the other hand is defined as "a notch or recess" (Random House Webster's College Dictionary, Page 682, Def. No. 1, Copyright 1992, attached hereto as "Exhibit D"). Opening (341, 241) passes completely through the cover (320) and is clearly not an indentation as called for in claim 1. Combining Mockridge with Jokinen fails to remedy this deficiency.

Mockridge pertains to the assembly of the front and back housings (12, 14) of a phone and nothing more. The front and back housings (12, 14) are held together by locking tabs that engage holes. The locking tabs are located on the side walls (34, 36) of the back housing (14) and the holes are located in the side walls (24, 26) of the front housing (12). As described above, these holes of Mockridge are not indentations, and Mockridge does not disclose or suggest indentations as called for in Applicant's claim 1. Thus, since neither Jokinen nor Mockridge disclose or suggest that the cover comprises a plurality of indentations configured to receive the plurality of lips as called for in

Applicant's claim 1, their combination cannot as well. Claim 1 is patentable over the combination of Jokinen and Mockridge for at least this reason.

Furthermore, claim 1 is amended to recite that the lips attach the edges of the keymat to the cover. The combination of Jokinen and Mockridge fail to disclose or suggest this feature.

In Jokinen, the edges of the keymat (310) are clearly not attached to the front cover (320). Figures 3a-3c clearly show that the keymat (310) is attached to the front cover (320) by the circumferential lip (314) of the key pin (313) which is located on an interior portion of the keypad (310) leaving the edges of the keymat (310) free.

In Mockridge, the keypad is located on the endoskeleton (16) (Col. 3, L. 21-28) and is not attached to the cover (12). The endoskeleton (16) is enclosed between the front and rear housing (12, 14). The front and rear housings (12, 14) are held together by locking tabs and corresponding holes. Thus, because neither Jokinen nor Mockridge disclose or suggest that the lips attach the edges of the keymat to the cover, their combination cannot as well. Therefore, claim 1 is patentable over the combination of Jokinen and Mockridge for this additional reason.

Claims 6 and 11 are patentable over the combination of Jokinen and Mockridge for reasons similar to those described above with respect to claim 1. Claims 2-5, 7-10 and 12-16 depend from claims 1, 6 and 11 and are patentable at least by reason of their respective dependencies.

Further, claim 2 recites that the keymat comprises one or more guiding pieces and the cover comprises one or more corresponding guiding recesses. The Examiner argues that this feature is

disclosed in Mockridge in Fig. 1 (reference numbers 62, 68 and 66) and at column 5, lines 28-50. Referring to Figure 1 of Mockridge, the cantilever arm (62) comprises an oval head (63), which is connected to the top end of the front housing (12) by an arm (65). The oval head (63) snaps into loop (64) (See Fig. 6) which is an oval shaped opening (i.e. hole), not a recess. (Col. 4, L. 25-30). Thus, the arm (62) and the loop (64) do not guide anything and are nothing more than a snap used to hold the two halves of the cover together (See Col. 5, L. 43-50). As shown in Figs. 7-9 of Mockridge, the "V" shaped hooks (68, 66) engage similarly shaped latches (72, 70) (Col. 5, L. 3-50). The sloped surfaces of the hooks (68, 66) and the latches (72, 70) aid in aligning the front and rear housings (12, 14) (Col. 5, L. 43-50). However, the hooks (68, 66) and the latches (72, 70) are clearly not recesses. The hooks (68, 66) are just that, hooks, while the latches are protrusions extending from an inside wall of the front housing (12). Moreover, neither the arm (62), the hooks (68, 66) nor the latches (72, 70) are part of the keymat in Mockridge. Thus, claim 2 is patentable over the combination of Jokinen and Mockridge. Claims 7 and 12 are patentable over the combination of Jokinen and Mockridge for reasons similar to those described above with respect to claim 2.

Claim 3 recites that the guiding pieces are arranged in direct connection to one or more of the plurality of lips. The Examiner argues that this feature is disclosed in Mockridge in Figs. 1 and 10 and at column 5, lines 28-50. For the reasons described above with respect to claim 2, the arm (62) and loop (64) are not guides. Furthermore, the arm (62), the hooks (68, 66) and the latches (72, 70) are not directly connected to any of the locking tabs of the rear housing (14). Thus, claim 3 is patentable over the combination of Jokinen and Mockridge. Claim 13 is patentable

for reasons similar to those described above with respect to claim 3.

Claim 4 recites that the keymat comprises one or more guiding recesses and the cover comprises one or more corresponding guide pieces. The Examiner argues that the latches (70, 72) on the front housing (12) of Mockridge are guiding recesses and the hooks (66, 68) on the rear housing (14) are guiding pieces. A recess is an indentation, which is exactly the opposite of the latches (70, 72). The latches (70, 72) are protrusions, not recesses, that extend from the interior wall of the front housing (12). Moreover, it is not disclosed or suggested in Mockridge that the latches (70, 72) are part of the keymat. Rather, it is clear that the latches (70, 72) are part of the front housing (12). Thus, claim 4 is patentable over the combination of Jokinen and Mockridge. Claim 14 is patentable for reasons similar to those described above with respect to claim 4.

Claim 5 recites that the guiding pieces comprise one or more ribs extended to be received by the guiding recesses. The Examiner argues that the hooks (66, 68) of Mockridge have ribs extending out to be received by the latches (70, 72). It is submitted that Mockridge does not disclose or suggest that the hooks (66, 68) have ribs. A hook by definition is a curve or angle for catching, pulling, holding or suspending something. The part of the hooks (66, 68) that wraps around the latches (70, 72) is merely the tip of the hook and not a rib. Furthermore, the hooks (66, 68) are not received by the latches as it is the hooks (66, 68) that hold the latches (70, 72). Therefore, claim 5 is patentable over the combination of Jokinen and Mockridge.

Claim 8 recites that the one or more guiding recesses are arranged in direct connection to one or more of the plurality of

indentations. The Examiner argues that this feature is disclosed in Mockridge in Figs. 1, 6, 7, 10 and 11 and in the Abstract. For the reasons described above neither the front, nor rear housings (12, 14) of Mockridge have a recess as claimed in claim 8. Moreover, the recess mentioned in the abstract is part of the endoskeleton (16) which is not in direct connection with hooks (66, 68) or the latches (70, 72) (Col. 3, L. 29-38). Thus, claim 8 is patentable over the combination of Jokinen and Mockridge.

Claim 10 recites that the guiding pieces are one or more ribs on a surface of the cover facing a place where a keymat is to be mounted. The Examiner argues that Figs. 1 and 11 of Mockridge "clearly show that the guiding pieces 68 and 66 are having ribs that are facing to where the other housing is to be mounted" and cites to column 5, lines 28-50. For the reasons stated above with respect to claim 5, by definition the hooks (68, 66) of Mockridge do not have ribs. Furthermore, the hooks (68, 66) are disclosed as facing the latches (72, 70) and not the keypad. Therefore, claim 10 is patentable over the combination of Jokinen and Mockridge.

Claim 15 recites a keymat wherein the one or more guiding recesses are an incision in a surface that is to be in contact with the cover when mounted on the cover. The Examiner argues that, in Mockridge, the loop (64) is an incision in the top wall of the rear housing (14) that is mounted to the cantilever arm (62) of the front housing (12). As described above, the loop (64) and arm (62) do not guide anything (See Mockridge, col. 5, lines 43-50). Further, the loop (64) is not mounted to the arm (62). The loop (64) and arm (62) form a snap for holding the front and rear housings (12, 14) together. Moreover, the loop (64) is not disclosed as being in a surface of the keymat in

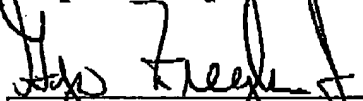
Mockridge. Therefore, claim 15 is patentable over the combination of Jokinen and Mockridge.

Claim 16 recites that the keymat is moulded in one piece. The Examiner argues that Mockridge discloses this feature in Figures 1, 2, 6, 7, 10 and 11 and at column 4, line 23 to column 5, line 50. To the contrary, the keypad of Mockridge is not shown in the drawings (See col. 3, lines 31-35). Further, column 4, line 23 to column 5, line 50 of Mockridge describes the attachment of the front housing (12) to the rear housing (14) and nothing more. Thus, claim 16 is patentable over the combination of Jokinen and Mockridge.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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